

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

<b>SUE BERTHOLD,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>v.</b>	)	<b>Case No. 4:20-CV-01167-DDN</b>
	)	
<b>THE STANDARD FIRE INSURANCE</b>	)	
<b>COMPANY,</b>	)	
	)	
<b>Defendant.</b>	)	

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**JOINT MOTION TO STAY**

Plaintiff Sue Berthold (“Plaintiff”) and defendant The Standard Fire Insurance Company (“Defendant”), by and through their respective undersigned counsel, for their Joint Motion to Stay, state as follows:

1. Plaintiff filed this action on August 27, 2020 (Doc. 1).
2. Defendant’s response to the complaint is due on or before February 15, 2021.
3. The legal arguments and issues in the instant action are similar to those made in the case styled *White Knight Diner, LLC v. Arbitration Forums, Inc.*, E.D. Mo. case number 4:17-cv-02406-MTS (“White Knight Action”).
4. The parties in the White Knight Action are pursuing dispositive motions on some or all of the legal issues raised in that case.
5. The parties believe that resolution of the legal issues in the White Knight Action may assist the parties in resolving some of the issues in this case.
6. Therefore, in the interests of economy and efficiency, the parties jointly move the Court for an order staying this action, and all deadlines in this action including defendant’s deadline to respond to the complaint, for a period of six (6) months.

7. The relief requested herein will prejudice no party.

**WHEREFORE** plaintiff Sue Berthold and defendant The Standard Fire Insurance Company respectfully move the Court for an order consistent with the foregoing, and for such further relief as this Court deems just and proper.

Respectfully Submitted,

/s/ Joseph A. Kronawitter

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 15, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will automatically send a notice of electronic filing to all person registered for ECF as of that date.

/s/ Joseph A. Kronawitter